

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

GULF MARINE FABRICATORS , LP
Plaintiff,

VS.

THE ATP INNOVATOR, bearing IMO No.
742, her tackle, furniture, apparel,
appurtenances, etc., *in rem*, and AMERINDO
SERVICES LTD. and BLUE SKY LANGSA
LTD., *in personam*,
Defendants.

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C. A. No. 2:16-cv-00430
Rule 9(h) - Admiralty

**DEFENDANTS' OBJECTIONS TO PLAINTIFF'S
STATEMENT OF UNCONTESTED MATERIAL FACTS**

TO THE COURT:

COME NOW *in personam* Defendants Amerindo Services Ltd. and Blue Sky Langsa Ltd.,
filing their Objections to Plaintiff's Statement of Uncontested Material Facts [Dkt. No. 54-1]
attached to its Motion for Partial Summary Judgment, and respectfully would show:

I.

OBJECTIONS

Defendants object to the following:

1. The ATP INNOVATOR is not a "rig" as is stated in paragraph 2.
2. Defendants do not know what is meant in paragraph 2 by the phrase "documented in the United States of America," and object according.
3. Defendants do not know what personnel Plaintiff provided "for the INNOVATOR," as stated in paragraph 3, and object accordingly.
4. Paragraph 11 fails to take into account the security deposit in the amount of \$165,000.00

that Plaintiff admits was paid to it by Defendants, both in its motion and on the invoices attached to its motion.

5. Defendants object to the statement in paragraph 12 that Plaintiff can recover attorneys' fees.

6. Defendants object to paragraph 13 to the extent the ATP INNOVATOR was been under arrest at Plaintiff's facility since October of 2016, so Defendants are not in a position to move the structure.

WHEREFORE, PREMISES CONSIDERED, *in personam* Defendants Amerindo Services Ltd. and Blue Sky Langsa Ltd. pray that their objections be sustained, and for such other relief to which they may be justly entitled.

Respectfully submitted,

By: /s/ Richard L. Gorman

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OF COUNSEL:

RICHARD GORMAN LAW

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of April 2017, a copy of the foregoing was served on counsel fo record ***By Notice of Electronic Filing.***

/s/ Richard L. Gorman

Of Richard Gorman Law

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